

1 WRIGHT, FINLAY & ZAK, LLP  
2 Christopher A.J. Swift, Esq.  
3 Nevada Bar No. 11291  
4 Lindsay D. Robbins, Esq.  
5 Nevada Bar No. 13474  
6 7785 W. Sahara Ave., Suite 200  
7 Las Vegas, NV 89117  
(702) 475-7964; Fax: (702) 946-1345  
[lrobbins@wrightlegal.net](mailto:lrobbins@wrightlegal.net)

6 *Attorney for Plaintiff Wilmington Trust, National Association, not in its individual capacity but  
7 as Trustee of ARLP Securitization Trust, Series 2014-2*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10  
11 WILMINGTON TRUST, NATIONAL  
12 ASSOCIATION, NOT IN INDIVIDUAL  
13 CAPACITY BUT AS TRUSTEE OF ARLP  
14 SECURITIZATION TRUST, SERIES 2014-2,  
15 a Federal Savings Bank,

16 Plaintiff,

17 vs.

18 COMMONWEALTH LAND TITLE  
19 INSURANCE COMPANY,

Defendant.

Case No.: 2:18-cv-02023-GMN-PAL

**STIPULATION AND PROPOSED  
ORDER EXTENDING PLAINTIFF'S  
TIME PERIOD TO RESPOND TO  
COMMONWEALTH'S MOTION TO  
DISMISS [ECF NO. 10]**

**(Second Request)**

20 Plaintiff Wilmington Trust, National Association, not in its individual capacity but as  
21 Trustee of ARLP Securitization Trust, Series 2014-2 (hereinafter "Wilmington"), and Defendant  
22 Commonwealth Land Title Insurance Company, ("Commonwealth") (collectively, the "Parties"),  
23 by and through their counsel of record, hereby stipulate and agree as follows.

24 Wilmington filed its Complaint on October 19, 2018 [ECF No. 1] and Commonwealth  
25 filed its Motion to Dismiss on January 18, 2019 [ECF No. 10] (hereinafter "Motion"). The  
26 Parties filed their first request to extend the time period to respond to Commonwealth's Motion  
27 on February 1, 2019, inadvertently requesting a deadline of March 3, 2019, a Sunday, for

1 Wilmington to file its response [ECF No. 14]. The Court granted the stipulation, entering a  
2 response deadline of March 3, 2019 [ECF No. 16]. Because the Parties did not realize that the  
3 requested deadline falls on a Sunday, the Parties request a brief extension for Wilmington to  
4 respond to the Motion. Additionally, due to several unforeseen scheduling conflicts, Counsel for  
5 Wilmington requests a brief extension to the deadline to respond to the Motion, from March 3,  
6 2019 to **March 8, 2019**.

7  
8 This is the Parties' second request for an extension and is not intended to cause delay or  
9 prejudice to any party.

10 IT IS SO STIPULATED

11 DATED this 1<sup>st</sup> day of March, 2019.

12  
13 **WRIGHT, FINLAY & ZAK, LLP**

14  
15 /s/ Lindsay D. Robbins  
16 Lindsay D. Robbins, Esq.  
Nevada Bar No. 13474  
17 7785 W. Sahara Ave., Suite 200  
Las Vegas, NV 89117  
18 Attorney for Plaintiff Wilmington  
Trust, National Association,  
19 not in its individual capacity but as  
Trustee of ARLP Securitization Trust,  
20 Series 2014-2

DATED this 1<sup>st</sup> day of March, 2019.

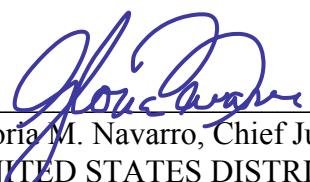
**EARLY SULLIVAN WRIGHT GIZER &  
McRAE LLP**

/s/ Sophia S. Lau, Esq.  
16 Sophia S. Lau, Esq.  
Nevada Bar No. 13365  
601 South Seventh Street, 2<sup>nd</sup> Floor  
17 Las Vegas, Nevada 89101  
18 Attorneys for Defendant, Commonwealth Land  
19 Title Insurance Company

21  
22 **ORDER**

23 IT IS SO ORDERED.

24 DATED this 4 day of March, 2019.

25  
26  
27  
28   
Gloria M. Navarro, Chief Judge  
UNITED STATES DISTRICT COURT

*Respectfully submitted by:*

# WRIGHT, FINLAY & ZAK, LLP

/s/ Lindsay D. Robbins, Esq.

Lindsay D. Robbins, Esq.

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of WRIGHT, FINLAY & ZAK, LLP and that I electronically served the foregoing **STIPULATION AND PROPOSED ORDER EXTENDING PLAINTIFF'S TIME PERIOD TO RESPOND TO COMMONWEALTH'S MOTION TO DISMISS (Second Request)** was made on March 1, 2019, to all parties and counsel as identified on the Court-generated Notice of Electronic Filing.

*/s/ Tonya Sessions*

---

An Employee of WRIGHT, FINLAY & ZAK, LLP